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November 21, 2019

Via Electronic Filing

The Honorable Magistrate Judge Steven Tiscione
U.S. District Court Eastern District of New York
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Chincha v. Patel*
Case No.: 1:17-cv-06127-ILG-ST

Dear Honorable Judge Tiscione:

This law firm represents Defendant Manojkumar Patel (the “Defendant”) in the above-referenced action. This letter is submitted on consent of Plaintiff’s counsel.

Pursuant to Rule I(D) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to extend: the discovery completion date of November 21, 2019 to, through and including, February 28, 2019. This is the fifth request for an extension of time, and this request is not made lightly.

By way of background, Your Honor had scheduled a settlement conference on December 4, 2019 at 11:00 a.m. [See Dckt. No. 38]. Extending the fact discovery deadline would provide the additional time to continue settlement discussions. Should the parties have to move forward with depositions prior to the Settlement Conference, they would incur significant costs and expenses that would drastically impair the prospect of any settlement. Thus, the parties respectfully request a short extension of time to complete fact discovery while settlement discussions are ongoing.

In addition, the undersigned has been advised by Plaintiff’s counsel that he will be traveling on holidays for two (2) weeks in January, which will complicate scheduling depositions.

This request would affect the dispositive motion practice deadline of December 20, 2019. Thus, the parties request that this deadline be extended to February 20, 2019.

Thus, Defendant respectfully requests that (a) the discovery completion date of November 21, 2019 be extended to, through and including, February 28, 2019; and (b) the dispositive motion practice deadline of December 20, 2019 be extended to, through and including, March 20, 2019.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein

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Cc: All Parties via ECF